

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

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CC Docket No. 92-105

The Use of N11 Codes)

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U S WEST, INC. COMMENTS

U S WEST, Inc. ("U S WEST") is pleased to comment in response to the Federal Communications Commission's ("Commission") Public Notice¹ regarding reservation of 311 for non-emergency police telephone calls. U S WEST supports nationwide use of 311 in this manner. Such use is clearly in the public interest and consistent with U S WEST's past advocacy regarding the use of N11 numbers for purposes that are national in scope and beneficial to the public.²

The success of dialing 911 to access emergency services (police, fire, medical) is unquestionable. Concurrent with its success, however, inappropriate use of the number has proliferated. Police departments across the nation apparently have

¹ Public Notice, Pleading Cycle Established For Request Of The United States Department Of Justice That 311 Be Reserved For Use By Communities For Non-Emergency Police Telephone Calls, CC Docket No. 92-105, DA 96-1500, rel. Sep. 10, 1996)("Public Notice").

² See, e.g., Comments of U S WEST, CC Docket No. 92-105 filed June 5, 1992.

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become concerned about use of 911 for nonemergency calls.³ The Commission clearly has the authority and the public interest it requires to alleviate this predicament.

The Communications Act of 1934, as amended, obliges the Commission to promote the safety and welfare of all Americans: “[F]or the purpose of promoting safety of life and property through the use of wire and radio communication . . . there is hereby created a commission to be known as the Federal Communications Commission. . . .”⁴ Since the safety of the public could be at risk when the 911 emergency number is used for other than its intended purpose, the Commission has the authority to remedy that situation. Utilization of 311 may accomplish that by helping emergency services personnel do their jobs more quickly and efficiently. Accordingly, the Commission should reserve 311 for national non-emergency police service use and provide general guidelines for that use.

To encourage proper use of 311 and full and cooperative participation by the public safety, government and communications industry sectors, U S WEST proposes that the Commission issue general guidelines concerning, implementation, consumer education and cost recovery issues along the following lines.

As an initial matter, the Commission should reserve 311 for exclusive nationwide public access to local police non-emergency services. Nationwide

³ See, e.g., Orlando Sentinel Tribune, Sep. 1, 1996 (“[911 line] has been overloaded by calls reporting nonlife-threatening incidents - including bats in attics and double-parked cars.”); and see U.S. News & World Report, Sep. 23, 1996.

⁴ 47 USC § 151.

reservation will minimize public confusion and provide uniformity even in cases where a consumer is located outside of his or her normal exchange area.

Although the Commission should reserve 311 on a nationwide basis, it should not require implementation of 311 service. State and local government and public safety organizations must decide whether it is in the best interests of their local citizens to invest in any necessary facility and equipment upgrades for receipt of 311 call information. That is, many communities may not benefit from use of 311 in addition to existing 911 service. Moreover, local budgets may not allow for such implementation.⁵

In order to avoid public confusion and encourage wide-spread acceptance and reliance upon 311 for its intended purpose, a consumer education plan should be initiated to inform the public of the scope of its use (and indirectly the appropriate use of 911). As such, U S WEST recommends that the Commission host an industry-wide meeting to discuss consumer education issues and to develop a related nationwide, coordinated advertising/marketing scheme. Invitees would necessarily include representatives from the following groups: PSAP administrators, carriers, police departments, and local and/or state safety commissions.

U S WEST supports nationwide reservation of 311 for non-emergency police service. In order to promote effective use, we urge the Commission to issue general

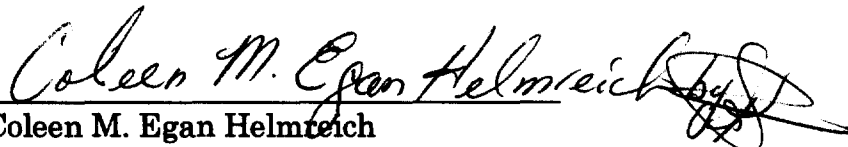
⁵ See Letter of Joseph E. Brann, U.S. Department of Justice, to Regina Keeney, Federal Communications Commission, dated Aug. 26, 1996 (“[w]e believe that the particular specifications of the service may vary in different communities and should be developed based upon their particular needs and capabilities.”).

guidelines for individual states and localities to observe in developing implementation plans that meet their respective communities' needs.

Respectfully submitted,

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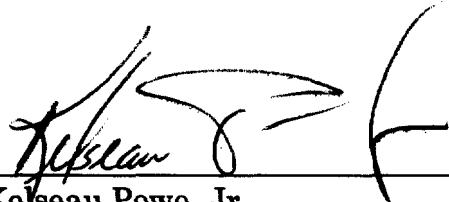
Its Attorney

Of Counsel,
Dan L. Poole

October 10, 1996

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 10th day of October, 1996,
I have caused a copy of the foregoing U S WEST, INC. COMMENTS to be served
via first-class United States Mail, postage prepaid, upon the persons listed on the
attached service list.



Kelseau Powe, Jr.

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(CC92105.COS/lh)

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